

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JASMINE BURGESS, individually, and on behalf
of all those similarly situated,

No. 20 Civ. 2816 (GHW)

Plaintiff,

v.

MAJOR MODEL MANAGEMENT INC., and
GUIDO DOLCI,

Defendants.

DECLARATION OF CYRUS E. DUGGER, ESQ.

1. I am the principal of the Dugger Law Firm, PLLC, which represents Plaintiff, the putative class, and the putative collective (“Plaintiff”) in this lawsuit. I make this declaration in support of Plaintiff’s opposition to the defendants’ Motion to Dismiss.

2. Attached hereto as **Exhibit A** is a true and correct copy of the Complaint filed on February 9, 2021 (NYSCEF Dkt. No. 1) by plaintiff Major Model Management, Inc. (“Major”) in the state court lawsuit *Major Model Management, Inc. v. Gubitosi, et al.*, No. 650911/2021 (N.Y. County Sup. Ct.) (“State Court Action”).

3. Attached hereto as **Exhibit B** is a true and correct copy of the First Amended Complaint filed on March 3, 2021 (NYSCEF Dkt. No. 4) by Major in the State Court Action.

4. Attached hereto as **Exhibit C** are portions of the legislative history of New York Senate Bill S7173B (2013-14 Legislative Session) obtained from the www.nysenate.gov public website.

5. Attached hereto as **Exhibit D** are portions of the legislative history of New York Senate Bill S1317 (2015-16 Legislative Session) obtained from the www.nysenate.gov public

website.

6. I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 7, 2021
Whitestone, NY

/s/ Cyrus E. Dugger
Cyrus E. Dugger, Esq.